

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MOOG INC.,

Plaintiff,

v.

Case No.: 1:22-cv-00187

SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and DOES NOS.
1-50,

Defendants.

DECLARATION OF KAZIM A. NAQVI

KAZIM NAQVI, under penalty of perjury and pursuant to 28 U.S.C. § 1746,
declares the following to be true and correct:

1. My name is Kazim Naqvi. I am an associate at Sheppard, Mullin, Richter & Hampton LLP. I am over the age of 18 years old. I have personal knowledge of the matters set forth herein and if called as a witness, I could and would competently testify as to all facts set forth herein. I am counsel for plaintiff Moog Inc. (“Moog”) and I provide this declaration in support of Moog’s Motion for Clarification of the Court’s Orders Regarding Third Party Discovery.

2. Attached as Exhibit “A” is a true and correct copy of a June 24, 2022 served by counsel for defendant Skyrise, Inc.

3. [REDACTED]

[REDACTED]

4. Attached as Exhibit “C” are true and correct copies of objections to Moog’s subpoenas served on August 1, 2022 by third parties Dan Gunderson, Alan Lee, and Tri Dao.

5. Attached as Exhibit “D” is a true and correct copy of a meet and confer e-mail sent by Moog to Skyrise on August 3, 2022.

6. Attached as Exhibit “E” are true and correct copies of objections to Moog’s subpoenas served on September 23, 2022 by third parties Mario Brenes, Lawrence Chow, Santiago Correa-Mejia, Cynthia Le and John Stafford.

7. Attached as Exhibit “F” is a true and correct copy of objections to Moog’s subpoena served on September 23, 2022 by third party Tim Baptist.

8. Attached as Exhibit “G” is a true and correct copy of objections to Moog’s subpoena served on September 30, 2022 by third party Sathya Achar.

9. [REDACTED]

10. [REDACTED]

11. [REDACTED]

12. On October 25, 2022, Moog proceeded to serve subpoenas for production of documents to Hummingbird Aero, Rex Hyde, and Lori Bird. Counsel for Moog and

Hummingbird Aero have started the meet and confer process regarding the subpoena. Counsel for Moog has not heard from Hyde or Bird.

13. Attached as Exhibit “K” is a true and correct copy of a meet and confer e-mail sent by Moog to counsel for third parties Mario Brenes, Lawrence Chow, Santiago Correa-Mejia, Cynthia Le and John Stafford on September 26, 2022. The parties met and conferred on September 29, 2022 but were unable to reach a resolution.

14. Attached as Exhibit “L” is a true and correct copy of a meet and confer e-mail sent by Moog to counsel for third party Tim Baptist on September 26, 2022. The parties met and conferred on September 29, 2022 but were unable to reach a resolution.

15. Attached as Exhibit “M” is a true and correct copy of a meet and confer e-mail sent by Moog to counsel for third party Sathya Achar on October 3, 2022. The parties met and conferred on October 7, 2022 but were unable to reach a resolution.

16. Attached as Exhibit “N” is a true and correct copy of e-mail correspondence between Skyrise’s counsel and Moog’s counsel between November 4 and 7, 2022.

I declare that the foregoing is true and correct under penalty of perjury under the laws of the United States of America.

Dated: November 7, 2022

/s/ Kazim Naqvi
Kazim Naqvi